



June 5, 2008

Joe Yun, Division of Planning and Local Assistance
Department of Water Resources
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Sacramento, CA 94236-0001
VIA ELECTRONIC MAIL: jyun@water.ca.gov
cc: DWR_IRWM@water.ca.gov; tracieb@water.ca.gov

Re: Draft Guidelines for Proposition 84 Integrated Regional Water Management Funding

Dear Mr. Yun:

On behalf of the California Coastkeeper Alliance (CCKA), a coalition of 12 Waterkeeper programs spanning the coast from the Oregon border to San Diego, Heal the Bay, and the Natural Resources Defense Council, we are writing to express our strong support for the inclusion of Low Impact Development (LID) as a Program Priority in the draft guidelines for Proposition 84 Integrated Regional Watershed Management (IRWM) funding.

Polluted stormwater runoff is the largest contributor to ocean water quality problems in California. The dominating paradigm of traditional stormwater management, which is that runoff is undesirable and must be removed from the site as quickly as possible to achieve good drainage, exacerbates this problem. This conventional approach leads to developments devoid of the natural features that facilitate runoff infiltration and flood protection. LID is an innovative management strategy that presents a solution capable of maximizing state investments by simultaneously mitigating stormwater runoff and flood risk. Not only is LID multifaceted in its applicability, but it is often more cost-effective than traditional stormwater management practices.

LID significantly increases the ecological integrity of the receiving waters by reducing the amount of polluted stormwater runoff and maintaining the hydrologic regime of the watershed. In doing so LID meets the goals of IRWM to advance urban water use efficiency, reduce the demand on stormwater systems, increase freshwater supply, improve water quality, and practice water stewardship by recharging groundwater and restoring aquatic ecosystems.

LID accomplishes these IRWM goals by creatively designing natural hydrologic functions into site designs of new developments or redevelopments, with the intent of replicating predevelopment hydrology. LID promotes groundwater recharge through designs that allow for runoff to be infiltrated rather than released quickly to water bodies, control peak flows, reduce stream bank erosion, mimic natural drainage patterns, and enhance the aesthetics of urban environments. By promoting the reduction of impervious surfaces, LID improves water quality and watershed integrity, while at the same time mitigating flood risk.

On May 15, 2008 the California Ocean Protection Council (OPC) passed a resolution regarding the promotion of LID as a superior approach to stormwater management. The OPC was established pursuant to the requirements of the California Ocean Protection Act in 2004. The OPC consists of the Resources Secretary Mike Chrisman (Chair), the State Lands Commission Chair (State Controller John Chiang), the Cal-EPA Secretary Linda Adams, two public members, and two legislative members, Senator Darrell Steinberg and Assembly Member Pedro Nava. The OPC is assigned the responsibility to coordinate and improve the protection and management of California's ocean and coastal resources.

The OPC adopted the following language in their May 2008 LID resolution specifically encouraging DWR to provide incentives for LID implementation in their IRWM and stormwater flood management funding programs:

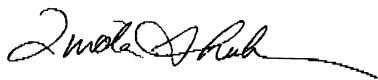
Section 1e: Department of Water Resources – The Department of Water Resources (DWR) is encouraged to provide incentives for LID implementation and habitat protection goals in its integrated regional water management (IRWM) and stormwater flood management funding programs to encourage watershed resource protection. **The OPC encourages DWR to adopt language to include the fostering of LID as a Program Priority in their draft IRWM guidelines.**

(Emphasis added.) We strongly support the OPC's LID resolution and encourage the DWR to join forces with the OPC in promoting LID as a sound solution to the water quality, water supply and flood management issues facing California. The future water quality improvement successes of IRWM projects funded by Proposition 84 depend on support for LID as a key stormwater management strategy. DWR is in a unique position to lead the state in this area through incentives for the use of LID in IRWMs, by adopting LID as a Program Priority in its draft guidelines for Proposition 84 funding.

Our organizations sit with DWR on the State Water Board's [Stormwater Advisory Task Force](#), along with representatives of the OPC, the California Coastal Commission, and U.C. Davis, all public entities that actively work to promote LID. Among other things, the Task Force works to promote the use of bond money on projects that address water quality and supply and reduce flooding. LID is capable of addressing all of these priorities. Adoption of LID as a Program Priority is consistent with the mission and mandates of this Task Force and its members' efforts. We urge the DWR to address the problems posed by stormwater pollution by including LID as a Program Priority in its draft Proposition 84 IRWM guidelines, which would ensure the use of Proposition 84 bond funds for much-needed LID projects.

Thank you.

Best regards,



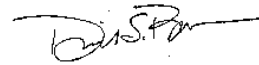
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